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Writer's Direct Access
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July 9, 2019

Via ECFS

Marlene J. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street SW
Washington, DC 20554

**Re: Commonwealth Edison Company's Responses to Complainant Crown
Castle Fiber LLC's First Set of Interrogatories (Proceeding Number 19-
170; Bureau ID Number EB-19-MD-005)**

Ms. Dortch:

Please find attached Commonwealth Edison Company's Responses to Complainant
Crown Castle Fiber LLC's First Set of Interrogatories in Proceeding Number 19-170; Bureau ID
Number EB-19-MD-005.

Sincerely,



Timothy A. Doughty
Attorney for Commonwealth Edison Company

Enclosures

cc: Rosemary McEnery, Enforcement Bureau
Adam Suppes, Enforcement Bureau

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

_____)	
)	
Crown Castle Fiber LLC)	
<i>Complainant,</i>)	
)	Proceeding Number 19-170
v.)	Bureau ID Number EB-19-MD-005
)	
Commonwealth Edison Company,)	
<i>Defendant</i>)	
_____)	

**COMMONWEALTH EDISON COMPANY’S RESPONSES
TO COMPLAINANT’S FIRST SET OF INTERROGATORIES**

Defendant Commonwealth Edison Company (“ComEd”), pursuant to Section 1.730 of the Commission’s Rules, 47 C.F.R. §1.730, submits the following Responses to the First Set of Interrogatories of Complainant Crown Castle Fiber LLC (“Crown Castle”) to ComEd related to its Rate Complaint captioned above (the “Complaint”).

INTERROGATORIES

INTERROGATORY NO. 1:

Identify the amount of the total excess accumulated deferred income tax (“excess ADIT”) amounts created by the federal Tax Cuts and Jobs Act of 2018 (TCJA), including any amounts recorded in FERC Accounts 190, 281, 282, and 283, that have been or will be transferred or recorded in special regulatory liability accounts (including but not limited to FERC Account 254) for 2017 and 2018. Please also identify each of the specific accounts to which the excess ADIT amounts have been or will be transferred or recorded in, and the related debited or credited amounts for each such account.

RESPONSE: ComEd relies on its previously stated objections, including the general objection that the FCC lacks jurisdiction. Until FCC jurisdiction is established, Crown Castle would not be entitled to receive the requested information in this proceeding. Should the FCC determine that it has jurisdiction, ComEd will provide a response.

INTERROGATORY NO. 2:

Identify Your amortization periods for the return of excess ADIT to ratepayers for protected and unprotected categories.

RESPONSE: ComEd relies on its previously stated objections, including the general objection that the FCC lacks jurisdiction. Until FCC jurisdiction is established, Crown Castle would not be entitled to receive the requested information in this proceeding. Should the FCC determine that it has jurisdiction, ComEd will provide a response.

INTERROGATORY NO. 3:

Identify any projections calculated by ComEd of the impact of the company’s TCJA related adjustments to ADIT on future pole attachment rents.

RESPONSE: ComEd relies on its previously stated objections, including the general objection that the FCC lacks jurisdiction. Until FCC jurisdiction is established, Crown Castle would not be entitled to receive the requested information in this proceeding. Should the FCC determine that it has jurisdiction, ComEd will provide a response.

INTERROGATORY NO. 4:

For each year from 2012 to 2018, identify the number of distribution poles that were solely owned by ComEd in Illinois.

RESPONSE: ComEd relies on its previously stated objections, including the general objection that the FCC lacks jurisdiction. Until FCC jurisdiction is established, Crown Castle would not be entitled to receive the requested information in this proceeding. Should the FCC determine that it has jurisdiction, ComEd will provide a response.

INTERROGATORY NO. 5:

For each year from 2012 to 2018, identify the number of distribution poles that were jointly owned by ComEd with another entity, including specifically AT&T.

RESPONSE: ComEd relies on its previously stated objections, including the general objection that the FCC lacks jurisdiction. Until FCC jurisdiction is established, Crown Castle would not be entitled to receive the requested information in this proceeding. Should the FCC determine that it has jurisdiction, ComEd will provide a response.

INTERROGATORY NO. 6:

For each year from 2012 to 2018, identify, as a percentage, ComEd's ownership interest in distribution poles that ComEd jointly owned with any other entity, including specifically AT&T.

RESPONSE: ComEd relies on its previously stated objections, including the general objection that the FCC lacks jurisdiction. Until FCC jurisdiction is established, Crown Castle would not be entitled to receive the requested information in this proceeding. Should the FCC determine that it has jurisdiction, ComEd will provide a response.

INTERROGATORY NO. 7:

For each year from 2012 to 2018, identify the number of poles included by ComEd in FERC Account 364 broken down by pole height. If ComEd includes this information in its continuing property records (CPR), please provide the information in the same format in which it is included in ComEd's CPR.

RESPONSE: ComEd relies on its previously stated objections, including the general objection that the FCC lacks jurisdiction. Until FCC jurisdiction is established, Crown Castle would not be entitled to receive the requested information in this proceeding. Should the FCC determine that it has jurisdiction, ComEd will provide a response.

INTERROGATORY NO. 8:

For each year from 2012 to 2018, provide the aggregated total of ComEd's capital costs and associated depreciation reserve for appurtenances included in FERC Account 364.

RESPONSE: ComEd relies on its previously stated objections, including the general objection that the FCC lacks jurisdiction. Until FCC jurisdiction is established, Crown Castle would not be entitled to receive the requested information in this proceeding. Should the FCC determine that it has jurisdiction, ComEd will provide a response.

INTERROGATORY NO. 9:

Explain whether ComEd now invoices or at any point since 2013 invoiced Crown Castle, including Sunesys, Lighttower, and Crown Castle NG Central, for pole attachments in

advance or in arrears, and for what billing period (i.e., calendar year).

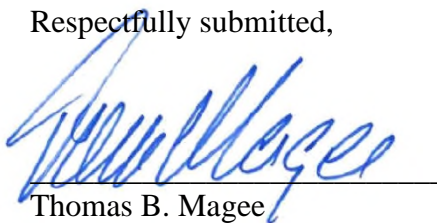
RESPONSE: ComEd relies on its previously stated objections, including the general objection that the FCC lacks jurisdiction. Until FCC jurisdiction is established, Crown Castle would not be entitled to receive the requested information in this proceeding. Should the FCC determine that it has jurisdiction, ComEd will provide a response.

INTERROGATORY NO. 10:

If You contend that Crown Castle, including Sunesys, Lighttower, and Crown Castle NG Central, has not paid You in full for any annual pole attachment rental, identify the invoice or invoices that you contend has not paid in full.

RESPONSE: ComEd relies on its previously stated objections, including the general objection that the FCC lacks jurisdiction. Until FCC jurisdiction is established, Crown Castle would not be entitled to receive the requested information in this proceeding. Should the FCC determine that it has jurisdiction, ComEd will provide a response.

Respectfully submitted,



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July 9, 2019

CERTIFICATE OF SERVICE

I, Timothy A. Doughty, hereby certify that on this 9th day of July 2019, a true and authorized copy of Commonwealth Edison Company's Responses to Complainant Crown Castle Fiber LLC's First Set of Interrogatories was served on the parties listed below via electronic mail and was filed with the Commission via ECFS.

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/s/
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